

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re Terrorist Attacks on September 11, 2001 | 03-MDL-1570 (GBD)(SN) ECF Case |
| This document relates to: <i>Amin et al v. Islamic Republic of Iran</i> , No. 20-cv-00412 <i>Anderson et al v. Islamic Republic of Iran</i> , No. 20-cv-00354 | |

**PLAINTIFFS' RENEWED MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT
JUDGMENT ON BEHALF OF *AMIN* AND *ANDERSON* PLAINTIFFS**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Barry Salzman and memorandum of law, together with the evidence filed in the above-captioned multidistrict litigation, the Plaintiffs in the above-captioned matters (the “*Amin* and *Anderson* Plaintiffs”), by and through their undersigned counsel, respectfully move this Court:

- (1) for a final order of partial judgment against Defendant the Islamic Republic of Iran pursuant to 28 U.S.C. 1608(e) and Rules 54(b) and 55 of the Federal Rules of Civil Procedure awarding each of the *Amin* and *Anderson* Plaintiffs listed in the table in Exhibit B to the Proposed Order filed herewith, each of whom is a personal representative of the estate of a U.S. citizen who was injured and ultimately killed as a result of the September 11 attacks, and each of whom was given leave to re-file a motion for damages, compensatory damages for pain and suffering consistent with the amounts previously awarded to other victims of the September 11 attacks, and prejudgment interest thereon at the rate of 4.96 per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and
- (2) for an order permitting the *Amin* and *Anderson* Plaintiffs listed in the table in

Exhibit B to the Proposed Order filed herewith to seek economic damages, punitive damages, or other damages at a later date, consistent with any future rulings made by this Court.

A Proposed Judgment is filed simultaneously with this Notice.

Dated: June 24, 2024

Respectfully submitted,

/s/ Barry Salzman
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